

TCEQ, Air Permits Division
Municipal Solid Waste Landfill Stakeholder Group
March 18, 2004
1:00pm - 4:00pm
TCEQ, Bldg. C Rm 131E

Agenda

I Opening Remarks Anne Inman

II Background or Update Information Beryl Thatcher

A stakeholder meeting was held in November 2003 to notify stakeholders of the changes occurring in air permitting for municipal solid waste landfills (MSWLs). The general operating permit (GOP) for MSWLs is being revised to only include permits by rule (PBRs) and standard permits. The PBR for MSWLs is being revised and the standard permit in 30 TAC Chapter 116 is being repealed and replaced with a non-rule standard permit. The new non-rule standard permit will enable most MSWLs to qualify for the GOP and will give a streamlined approach to permitting for landfills.

III Discussion Topics Beryl Thatcher

A. Permit by Rule Revisions

Based on modeling and a health effects review, rule revisions to the PBR have been drafted. Draft rule language was submitted to stakeholders prior to the meeting. Comments were specifically requested concerning the referencing of federal and state rules and regulations that may be applicable.

B. Non-Rule Standard Permit

Based on modeling and a health effects review, a new, non-rule standard permit for MSWLs has been developed. Draft rule language was submitted to stakeholders prior to the meeting. Comments were specifically requested for the following:

1. Exclusion of passive gas collection system
 - a. Are these used at any landfills in Texas?
 - b. What are the efficiencies of these systems?
2. Is the use of 30 TAC §106.261, §106.262 and the petroleum hydrocarbon limit for bioremediation pad limits feasible?
3. Waste stabilization
 - a. Are the limits of 30 TAC §106.261 and §106.262 feasible?
 - b. Suggestions for improvement to this condition?
4. Welding limits
 - a. How often is welding conducted at a landfill?
 - b. During what hours does welding typically occur?
 - c. Does welding typically occur in an enclosed area?
5. Maintenance, start-up and shutdown emissions
 - a. What types of maintenance, start-up and shutdown activities occur at a landfill?
 - b. Do compressor blowdowns occur?

6. Rule referencing
 - a. Is it helpful to reference other federal and state rules and regulations that may be applicable?
7. Tier 2 MSWLF (< 2.5 million megagram (Mg) capacity & >50 Mg/yr non-methane organic compound (NMOC))
 - a. How many of these types of landfills are in Texas?
 - b. If there are any, where in Texas are they located?
 - c. What are the emission rates for these types of landfills?
8. Engine restrictions
 - a. Is the combined 9,250 horsepower (hp) for the engines in the gas collection and control systems feasible?
 - b. Is the combined 240 hp for portable engines feasible?

C. Open Discussion Open Discussion

1. Can the limit of the PBR be expanded to the Mg limit in 40 Code of Federal Regulations (CFR) Part 60, Standards of Performance for New Stationary Sources, Subpart WWW (NSPS WWW) and have the Tier II and Tier III test methods? We can look at expanding the exemption. However, once a facility ages and triggers NSPS WWW, they will no longer qualify for the PBR.
2. Does the PBR apply to closed landfills? Only applies to active.
3. No landfill in Texas will qualify for the revised PBR as it is. Can it be expanded to authorize common maintenance activities such as parts washers and tanks? We will evaluate the inclusion of these activities.
4. Could a non-hazardous waste landfill or non-industrial landfill qualify for the PBR? No, however, they may qualify for the standard permit.
5. How can we determine the emissions crossing the property line are from our site and not from our neighbor? The emissions must be “generated” from your site. The landfill is not required to control emissions from a Texas wind storm or emissions from another site.
6. Some closed sites and Type IV landfills have a passive gas collection system. In order for landfills with passive gas collection systems to be considered for inclusion into the standard permit, the Air Permits Division will require control efficiency data of such devices.
7. Does the 50 Mg/yr limits include controls? NSPS WWW specifies the NMOC emission rate calculation. Emission controls are not considered.

Stakeholders also made the following comments, which will be considered:

- Stakeholders noted that waste stabilization depends on Class I waste versus municipal waste. In addition, there is a difference between liquid and solid waste. Also, there is a difference between adding compounds to thicken a liquid for volatilization and adding dirt to bulken.
- Stakeholders expressed concern about the visible emission requirement in the PBR.
- Waste solidification is done in a pit in the landfill cell.
- Stakeholders requested that welding limits have a distance limitation or an hours/week limit and that a time of day restriction is not preferred, since welding is often conducted after hours.

- Stakeholders requested that the a statement in the standard permit state that all activities of maintenance are covered.
- Stakeholders commented that the Tier 2 landfill should be removed since the requirements are more stringent than the federal rules.
- Stakeholders requested that “portable” equipment be defined more clearly for the engines.
- Stakeholders commented that rule referencing can be confusing, especially if the rule specifies an exemption
- Stakeholders believe passive gas collection systems to a control device should be allowed if they are below the ESL thresholds.
- Should passive vents be permitted?

IV Closing Remarks/Action Items Beryl Thatcher

Comments on the PBR are to be submitted no later than March 23, 2004.

Comments on the non-rule standard permit are to be submitted no later than April 9, 2004. Comments should be submitted to Ms. Beryl Thatcher via email to bthatche@tceq.state.tx.us, faxed to (512) 239-1070 or by U.S. mail to P.O. Box 13087, MC-163, Austin, TX 78711-3087.

V Next Meeting Date

No meeting has been scheduled. Stakeholders will be notified of any upcoming meetings via the listserver.

Meeting Attendees (next page)

TCEQ, Air Pe
MSWL Stakeh
March 1
1:00pm -
TCEQ, Bldg
Sign-In

Attendee Name
(Please Print Legibly)

Tim Airheart
Robert Kennedy
DAN WITTLIFF
Matt Stutz
MARK HABERGER
Chuck Rivette
Joe Vierco
ERIC BIRCH
Angela Manna amanna@rmclawfirm.co
Vance Kemler
Chris Dick
Arten Avakian
John Gott
Lisa Anderson
Robert C. Vickery
Tony Ionescu
Laura LaValle
Alysi Lerman
Kathleen Switzer
John Hargrove